



## **Privacy Policy**

Effective date: March 24, 2021

We at Outdoor Elements know you care about how your personal information is used and shared, and we take your privacy seriously. Please read the following to learn more about our Privacy Policy. By using or accessing the OE Smart Controls via the Application or in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways.

Remember that your use of is at all times subject to OE Smart Controls Agreement (as applicable) (the “Standard Agreements”), incorporate this Privacy Policy. Any terms we use in this Privacy Policy without defining them have the definitions given to them in the Standard Agreements.

### **Type Of Information This Privacy Policy Covers**

This Privacy Policy covers our treatment of personally identifiable information ("Personal Information") that we gather when you are accessing or using our Smart Controls. We gather various types of Personal Information from our users, as explained in more detail below, and we use this Personal Information internally in connection with our Services, including to personalize, provide, and improve our services, to allow you to set up a users OE Smart Controller to contact you, to fulfill your requests for certain products and services, and to analyze how you use the OE Smart Controls. In certain cases, we may also share some Personal Information with third parties, but only as described below.

## Children's Privacy

We do not knowingly collect or solicit personal information from anyone under the age of 13. If you are under 13, please do not attempt to register for the Services or send any personal information about yourself to us. If we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that a child under 13 may have provided us personal information, please contact us at [Info@OutdoorElementsUSA.com](mailto:Info@OutdoorElementsUSA.com).

## Notification Of Changes To This Privacy Policy

We are constantly trying to improve our OE Smart Controls, so we may need to change this Privacy Policy from time to time as well, but we will alert you to changes by placing a notice on the Application, by sending you an email, and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is collected.

## How We Collect Information

### Information You Provide to Us:

We receive and store any information you knowingly provide to us. For example, through the registration process and/or through your settings, we may collect Personal Information such as your name, email address, mailing address, phone number.

We may communicate with you if you've provided us the means to do so. For example, if you've given us your email address, we may email you about your use of the Services. If you do not want to receive communications from us, please indicate your preference by emailing us at [Info@OutdoorElementsUSA.com](mailto:Info@OutdoorElementsUSA.com).

### Information Collected Automatically

Whenever you interact with our OE Smart Controls, we automatically receive information on from your browser or device, which may include your IP address,

geolocation data, device identification, “cookie” information, the type of browser and/or device you’re using to access our Services, and the page or feature you requested. “Cookies” are identifiers we transfer to your browser or device that allow us to recognize your browser or device and tell us how and when pages and features in our Smart Controls are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your device’s acceptance of cookies, but this may prevent you from taking advantage of some of our features.

If you click on a link to a third party website or service, a third party may also transmit cookies to you. Again, this Privacy Policy does not cover the use of cookies by any third parties, and we aren’t responsible for their privacy policies and practices. Please be aware that cookies placed by third parties may continue to track your activities online even after you have left our Smart Controls, and those third parties may not honor “Do Not Track” requests you have set using your browser or device.

We may use this data to customize content for you that we think you might like, based on your usage patterns. We may also use it to improve the OE Smart Controls for example, this data can tell us how often users use a particular feature of the OE Smart Controls and we can use that knowledge to make the OE Smart Controls as interesting for as many users as possible.

#### Collection of Location Information

We may collect information regarding the location of your device when you access the Services, unless you choose to disable location data through your device settings. We may deliver information or content specific to your location to you via the OE Smart Controls as a result of the location data we collect. If you disable the collection of geolocation information, the OE Smart Controls may not function as intended. Additionally, the opt-out mechanism on some operating systems may not be persistent, which will require you to opt-out of such collection each time you access the OE Smart Controls through your device.

#### Information Collected from Other Websites and Do Not Track Policy

Through cookies we place on your browser or device, we may collect information about your online activity after you leave our OE Smart Controls. Just like any other

usage information we collect, this information allows us to improve the OE Smart Controls and customize your online experience, and otherwise as described in this Privacy Policy. Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. Our Smart Controls do not support Do Not Track requests at this time, which means that we collect information about your online activity both while you are using the OE Smart Controls and after you leave our OE Smart Controls.

## How We Use and Share Your Personal Information

We do not rent or sell your Personal Information in personally identifiable form to anyone, provided certain Personal Information may be transferred in connection with business transfers, as described below. We may share your Personal Information with third parties as described in this section:

### Information that’s been de-identified

We may de-identify your Personal Information so that you are not identified as an individual, and provide that information to our partners. We may also provide aggregate usage information to our partners (or allow partners to collect that information from you), who may use such information to understand how often and in what ways people use our OE Smart Controls, so that they, too, can provide you with an optimal online experience. However, we never disclose aggregate usage or de-identified information to a partner (or allow a partner to collect such information) in a manner that would identify you as an individual person.

### Affiliated Businesses

In certain situations, businesses or third party websites we’re affiliated with may sell or provide products or services to you through or in connection with the Services (either alone or jointly with us). You can recognize when an affiliated business is associated with such a transaction or service, and we will share your Personal Information with that affiliated business only to the extent that it is related to such transaction or service. For example, if you submit a proposal for OE Smart Controls Services through [Info@OutdoorElementsUSA.com](mailto:Info@OutdoorElementsUSA.com), we may share certain parts of

your Personal Information with the User who made the request. We have no control over the policies and practices of third party websites or businesses as to privacy or anything else, so if you choose to take part in any transaction or service relating to an affiliated website or business, please review all such business' or websites' policies.

### Agents

We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you;. Unless we tell you differently, our agents do not have any right to use the Personal Information we share with them beyond what is necessary to assist us. Note that an “agent” may also be considered a “partner” in certain circumstances, and would be subject to the terms of the “Information that’s been de-identified” section in that regard.

### Business Transfers

We may choose to buy or sell assets, and may share and/or transfer customer information in connection with the evaluation of and entry into such transactions. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information could be one of the assets transferred to or acquired by a third party.

### Legal Requirements

We may also disclose your personal or non-personal information as follows:

- in response to a subpoena or similar legal requirement;
- to comply with applicable law or cooperate with law enforcement or other government agencies;
- to establish or exercise our legal rights including enforcing our Standard Agreements or other agreements and policies;
- to defend against legal claims;
- to aid with efforts to investigate, prevent, or take action regarding suspected illegal activity such as fraud or other wrongdoing;
- to protect and defend the safety or property of , users, employees, and others;
- as otherwise required by law;

## How We Protect Your Information

We employ appropriate physical, procedural and technological security measures, which are reasonably designed to help protect your personal information from unauthorized access or disclosure. We may use encryption, passwords, and physical security measures to help protect your personal information against unauthorized access and disclosure. No security measures, however, are 100% failsafe. Therefore, we do not promise and cannot guarantee, and thus you should not expect, that your personal information or private communications will not be collected, disclosed and/or used by others. You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, keeping your log-in and password private, and not recycling passwords from other websites or accounts. We are not responsible for the unauthorized use of your information nor for any lost, stolen, or compromised passwords, or for any activity on your account via unauthorized password activity.

## Links To External Websites

The Application may contain links to other websites or resources over which we do not have any control. Such links do not constitute an endorsement by those external websites. You acknowledge that providing these links to you only as a convenience, and further agree that we are not responsible for the content of such external websites or the protection and privacy of information you provide while visiting such external websites.

## Email Choice/Opt-out

If you no longer wish to receive updates or notifications you may opt-out of receiving these communications by email [Info@OutdoorElementsUSA.com](mailto:Info@OutdoorElementsUSA.com).

## Accessing and Updating Personal Information

Through your account settings, you may access, and, in some cases, edit or delete the following information you've provided to us:

- name and password
- email address

- mailing address
- phone number
- location

The information you can view, update, and delete may change as the OE Smart Controls change. If you have any questions about viewing or updating information we have on file about you, please contact us at [Info@OutdoorElementsUSA.com](mailto:Info@OutdoorElementsUSA.com).

## Rights of California Residents

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Information to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at . California residents are entitled to ask us for a notice identifying the categories of Personal Information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to: .

## Choices Regarding Collection and Use of Your Personal Information

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our features.

You may be able to add, update, or delete information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. You may request a suspension of your account by e-mailing . When you suspend your account, your profile information may remain in our records. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally.

## Information Retention Policy

We may retain information provided by our users for an indefinite amount of time and by providing information to us, you consent to such retention. We will delete information from our databases as required by law (eg, Children's Online Privacy

Protection Act). If you send us a written request to delete any of your account information, we will respond to such request and comply as we deem appropriate, in our sole discretion. Please submit such requests to . By using the OE Smart Controls, you hereby represent and warrant that you understand and agree that all information submitted by you to the OE Smart Controls will be used in accordance with this Privacy Policy and the Standard Agreements in our sole discretion.

### Disclaimer as to Security

By accessing and using the Application, you agree to the terms of this Privacy Policy, and you acknowledge that no data transmission over the Internet is completely secure. We cannot guarantee or warrant the security of any information you provide to us and you transmit such information to us at your own risk.

### Contact Information

If you have any questions or concerns regarding our privacy policies, please send us a detailed message to [Info@OutdoorElementsUSA.com](mailto:Info@OutdoorElementsUSA.com), and we will try to resolve your concerns.